



2014 Biennial Notice for Multi-County Agencies

The Political Reform Act requires every local government agency to review its conflict of interest code biennially.

OCTOBER 1, 2014 DUE DATE

Your agency must review its conflict of interest code and submit the attached notice to the FPPC indicating whether or not an amendment is necessary. You must return this notice to the FPPC regardless of how recently your agency's code has been approved, or even if the code is currently under review.

If amendments are necessary, the revised code must be forwarded to the FPPC for approval.

ATTEND A WEBINAR OR WORKSHOP

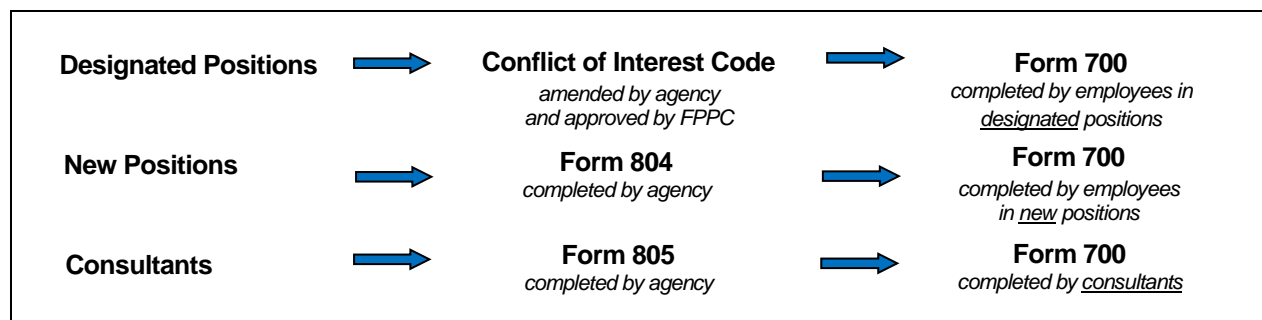
Current training schedules are available at www.fppc.ca.gov under [Webinars, Seminars & YouTube](#). To sign up for free training, visit our website and register at Eventbrite. Webinars and workshops are subject to change.

IMPORTANT

- An agency's amended code is **not** effective until it has been approved by the FPPC.
- Provide a copy of the conflict of interest code to Form 700 filers so that they understand what to disclose when they complete the form.

FORMS 804 & 805

The chart below illustrates how the designated positions in the conflict of interest code and Forms 804 and 805 relate to the Form 700 and who completes each form. Forms 804 and 805 may be used to identify new positions and consultants that will make or participate in making governmental decisions on behalf of the agency. These forms are also used to identify the new position's or consultant's disclosure requirements which should conform to the range of their duties.



EXAMPLE 1: An agency hires a new IT Specialist. This is a brand new position, thus not listed in the agency's conflict of interest code. This individual will make decisions on purchasing software so the position must be added to the code. The agency completes and retains the **Form 804** to provide the individual with limited disclosure relating to IT interests. The individual files a Form 700 within 30 days of assuming office. The position will be added to the code when it is next amended.

EXAMPLE 2: An agency hires a firm to prepare an environmental impact report ("EIR") on airport expansion. It is determined that the consultant assigned to the project will participate in the decisions concerning where expansion may occur. The consultant who will prepare the EIR (not the consultant's firm) should be assigned a disclosure requirement that reflects the contract's scope of authority. A sample disclosure category in this case might include disclosure of "real property, investments and business positions in business entities, and income from only those sources engaging in air traffic or aviation goods or services." Alternatively, the agency may assign an existing disclosure category, if appropriate. The agency completes and retains the **Form 805** to provide the individual with limited disclosure relating to the appropriate interests. The consultant files a Form 700 within 30 days of assuming office.